

TVO-386  
Re Correspondence

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY) (Record of item checked above)	
TO:	FROM:	DATE	
South Cavalcade files	Jim Pendergast	8-8-88	
		TIME	
SUBJECT			
Re: Phone Call with Shannon Craig on Remedial Goals/Plans for Soils			
SUMMARY OF COMMUNICATION			
<p>I talked with Shannon Craig of Keystone about the remedial goals and PHEA assumptions.</p> <p>First, I told her that my objection with the onsite commercial occupant scenario is the 3% factor to adjust for the fraction of the site which is contaminated compared to the fraction used for commercial activities. My problem is that this factor weights the site as a whole whereas the exposure is business specific. I told her that I could only support a fraction which is the highest for all onsite businesses. This is Palletized with a factor of 13%. Shannon agreed.</p> <p>Second, based on the above discussion, I told her that the PHEA supports a <math>10^{-5}</math> risk level of 1060 ppm carcinogenic PAHs for the onsite commercial scenario. However, the scenario driving the risk is the one for future potential construction workers (for continued development of the site in the areas of contamination). We agreed that this type of development is not very likely without a complete destruction of the existing structures. Also, the type of construction may not take as long as estimated in the PHEA, nor may it be as intrusive as expected. Therefore, a <math>10^{-4}</math> risk could be borne by this group which results in a 700 ppm carcinogenic PAH level. She agreed that Koppers could live with 700 ppm.</p> <p>We recognized that the actual measure driving soil remediation is the leaching potential. The Keystone treatability test showed leaching down to 140 ppm total PAHs. Therefore, the risk-based cleanup levels are probably higher than a leaching-based level.</p> <p>Last, we discussed the remedial action for soils. Shannon indicated that Koppers would support an in situ method because it would be effective, would work with the groundwater remedy, and would be the lowest cost. She understood my reservations about the Palletized property and the potential for an in situ process driving the groundwater contamination offsite. I told her that EPA would be looking at another remedy in this area, most likely an excavation one because the in situ fixation and cap is 4 times as expensive.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
Look for the above discussion reflected in the final FS report and PHEA.			
INFORMATION COPIES			
TO:			

R6-123 (2-84)

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